

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6311-Cr-Huck

UNITED STATES OF AMERICA,

Plaintiff,

v.

LARRY CRENSHAW and  
CLARENCE LARK,

Defendants.

FILED BY *[Signature]*  
00 DEC 28 PM 3:25  
CLARENCE LARK  
CLERK U.S. DIST. CT.  
S.D. OF FLA. - MIA

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

COME NOW the Defendants, Larry Crenshaw and Clarence Lark, and respectfully move for the entry of an Order extending the time for the filing of Pretrial Motions and in support thereof state:

1. Discovery in this matter, upon which to predicate pretrial motions, is incomplete and has virtually just begun. Undersigned counsel just received the first small packet of discovery information late last week.

2. Based upon the complexity of the charges and the number of defendants in this case the parties anticipate discovery to be voluminous.

3. A Status Conference in this matter is set for January 4, 2001 at 8:00 a.m. Based upon the seriousness of the charges, the estimated length of trial (70 trial days), and the number of defendants and defense lawyers and their schedules, without being presumptuous, undersigned counsel believe that the trial date to be established for this matter will be substantially in the future.

NON-COMPLIANCE OF Fed. R. Cr. P. 71A *[Signature]*

117 *[Signature]*

4. Undersigned counsel respectfully request that this matter be taken up at the Status Conference on January 4<sup>th</sup> after a trial date is established and the court is informed of the extensiveness of the discovery materials.

**WHEREFORE**, for the foregoing reasons, Defendants respectfully request this Honorable Court extend the deadline for the filing of pretrial motions and grant such other relief as it deems just and proper.

Respectfully submitted,

**PAUL D. LAZARUS, P.A.**

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By: 

**PAUL D. LAZARUS, ESQ.**  
Florida Bar No. 242349

By: 

**DONALD I. BIERMAN, ESQ.**  
Florida Bar No. 093244

**CERTIFICATE OF SERVICE**

**WE HEREBY CERTIFY** that a true and correct copy of this Motion was furnished by mail, on this 28<sup>th</sup> day of December, 2000, to: See attached Service List.

  
**PAUL D. LAZARUS, ESQ.**

SERVICE LIST  
UNITED STATES v CLARENCE LARK  
CASE NO. 00-6311-Cr-Huck

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